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and play the voice message from the first telephone automatically regardless of receiving user action. (Emphasis added)

Limitations (1), (2) and (3) are not performed by Han because in addition to limitations (1), (2) and (3), Han is not a "multiline KSU-less telephone system for providing a paging feature" as acknowledged by the Examiner. Accordingly, Han cannot function in a manner to perform functions of a "multiline KSU-less telephone system."

The system of Han, shown in FIG. 1, is a "switching system" having an automatic attendant function (column 3, line 9-11). The entire description of Han is a function of a "switching system" performing various operations including sending a ring signal to a telephone and automatic attendant functionality (with paging and automatic answering features). Accordingly, when the caller enters the extension number or group extension number, the entered numbers are interpreted by the "switching system" to perform the selection or routing. Thus, the "first telephone" of Han (which is assumed to be a telephone used by the caller) does not function to select a group of telephones or perform any of the limitations (1), (2) and (3) described above.

For example, with respect to "initiating a voice message" (limitation 2), in one interpretation, such voice message is initiated by the caller who enters the numbers including "a voice paging request number" which is "0000," as described in column 4, lines 63-65. In another interpretation, the "switching system" initiates the voice message by virtue of its operation to interpret the "a voice paging request number" and carry out functions related thereto. Contrary to either of the interpretations of Han, the "first telephone" of the present invention performs the selection by virtue of its operation in a "multiline KSU-less telephone system."

Han performs paging by using a "broadcasting unit 123" wherein the "broadcasting unit 123" plays (reproduces) the voice message, as described in column 5, lines 35-40. Such operation is contrary to the present invention which states "the group of telephones receive and play the voice message from the first telephone." (Emphasis added) Moreover, Han is completely devoid of any description that "the group of telephones receive and play the voice message from the first telephone." Instead, Han states in column 6, lines 30-36:

the broadcasting unit 123 being connected to the central line circuit 117 where a voice paging channel is established. The voice message from the caller is reproduced by the broadcasting unit 123. (Emphasis added)

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Although, Han **does not** describe the "*broadcasting unit 123*" in detail, Han also **does not** describe the "*broadcasting unit 123*" as being a telephone or a group of telephones, as claimed.

The embodiment of FIG. 1 of Han is of a "*switching system*" having an automatic attendant function (column 3, lines 9-12) such as for private exchange and key telephone systems (column 1, lines 20-21). As is well known, attendants, whether automated or not, send out over an intercom system (which is not generally embedded in the phones but speakers distributed throughout an office) a page to an employee or subscriber that is away from their telephone.

Nevertheless, assuming Han teaches the limitations (1), (2) and (3), if such operations were performed, a "*first telephone*" would be the "*telephone*" used by the caller connected to a Central Office. Such "*telephone*" is connected through the central office line circuit 117 having an a central office line speech loop. It is **not possible**, to modify Han to be a "*multiline KSU-less telephone system*" that includes a "*first telephone*" connected to the Central Office site. Modifying Han in such a manner would render the "*system*" of Han inoperable since a "Central Office" would be incorporated in such "*system*." As is well known, telephones in a KSU-less multiline telephone are for small businesses or home systems with only a small number of telephone lines that can be simply interconnected to each other. The intelligence is distributed among the individual telephones, instead of being centralized in a KSU.

In paragraph 3 of the Office Action, titled "RESPONSE TO ARGUMENTS", the Examiner deems Applicants' arguments filed 9/17/2002 as being "not persuasive". Below, Applicants address the Examiner's rebuttal to those arguments addressed by the Examiner in the Office Action.

In paragraph 3, lines 3-16, the Examiner states:

Regarding Applicants' argument that Han does not suggest "the group of telephones receive and play the voice message from the first telephone", and further that Han described an embodiment related to the paging function when the caller does not know the number of the desired extension or the number of an extension group to which the extension subscriber belongs.

Accordingly, the examiner respectfully disagrees with Applicants' argument. Han recited, "When the caller at the site of the central office subsequently dials the number of a desired extension subscriber or the number of an extension group to which the extension subscriber belongs... the voice message is then announced, thereby reporting the incoming call" (see col. 6, lines 46-57). Thus, an extension group is known to contain at least 2 telephone extensions. When the voice message is announced to the extension

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group is known to contain at least 2 telephone extensions. When the voice message is announced to the extension group, it is outputted over that group. Furthermore, the above recited passage clearly indicated that the caller know the desired extension or extension group when initiate the call. Therefore, Han clearly read an Applicants' limitation as claimed. (Emphasis added)

Applicants agree that Han describes or sets forth the excerpts cited by the Examiner. However, such passage at column 6, lines 46-57 is completely mischaracterized by the Examiner.

First, the passage at column 6, lines 46-57 makes a general or a summarizing statement that *"the voice message is then announced, thereby reporting the incoming call."* Neither the passage nor the summarizing statement, describe the details set forth in columns 3, 4, 5 and column 6, lines 1-39 of Han. Moreover, such passage in Han by itself **does not** meet the claim limitations 1, 2, and 3, as set forth above. The Examiner's attention is directed to column 4, lines 1-20, column 5, lines 30-40, and column 6, lines 13-39 regarding the *"announcement"* of any information from the caller and the operation of the *"broadcasting unit 123"* to reproduce or play such announcements.

Second, as described above by the Examiner and as emphasized above, it appears the caller is selecting and initiating, instead of the *"first telephone,"* as claimed.

In paragraph 3, at page 4, line 17 through page 4, lines 1-3, the Examiner states:

Regarding Applicants' argument that "Han patent is not shown or describe as connected to the subscriber circuit 115 of Han, such as subscriber circuit having the telephone or subscribers connected thereto". Accordingly, the examiner respectfully disagrees. Han's disclosure clearly suggested "central processing unit 111 controls subscriber circuits 115 to send an output from ring generator 116 to telephone set of a desired extension subscriber (see col. 5, lines 41-50). It should be noted that the ringing signal is applied to the extension subscriber when the automatic attendant function is not used. Thus, when the automatic attendant function is used, voice message is generated in place of the ringing signal."

Applicants' quote by the Examiner is incomplete. The arguments referred to by the Examiner state in Applicants' previous response:

Furthermore, the broadcasting unit 123 of Han is not shown or described as connected to the subscriber circuit 115 of Han, such subscriber circuit 115 having the telephone or subscribers connected thereto. Instead, the broadcasting unit 123 is connected to the switching circuit 114, as best seen in FIG.1, via a voice paging channel to the central line circuit 117 and to the voice processing unit 121 (column 5, lines 20-25).

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